

12/20/99

**U.S. Consumer Product Safety Commission  
LOG OF MEETING**

CPSA 6 (b)(1) Cleared

☒ No Mfrs/PrvtLbrs for

Products Identified

\_\_\_\_ Excepted by \_\_\_\_\_

\_\_\_\_ Firms Notified,

Comments Processed.

**SUBJECT: UN Harmonization of Aerosol Flammability**

**DATE OF MEETING: November 17, 1999**

**LOG ENTRY SOURCE: Mary Toro, CPSC**

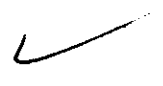
**DATE OF LOG ENTRY: December 20, 1999**

**LOCATION: CSMA 1913 Eye Street NW, Washington, DC 20006**

**CPSC ATTENDEE(S): Mary Toro, Compliance**

**NON-CPSC ATTENDEE(S): See attached attendee list**

**SUMMARY OF MEETING: Comments on the Draft Interagency Position of Flammable Aerosols position paper was discussed. CPSC had already presented their comments via email. Those changes were incorporated into the document presented by the DOT representative, Fritz Wybenga. There is still concern on the effect that the changes will have on products that are currently labeled to existing regulation. One of the areas discussed was the lessening of the definition for extremely flammable aerosols and the perceived expansion in the range of products that would be defined as flammable under the proposed document. The CSMA has put together a chart to show the impact of the changes on currently produced products their membership manufactures. This**



**chart did not show products that fall within the ranges where we are most concerned. EPA was also concerned that the same problems that arose at the last meeting were not being addressed here. That specifically is products that would be defined in the extremely flammable range.**

**CSMA said they would try to find products in that range to show how the changes would impact the labeling on those products. The CSMA said they would try to give us the requested info right away.**

**US Agencies cannot accept the CSMA proposed criterion until we are assured that the proposed criterion is not less protective than current criteria.**

**The criterion proposed by FEA (European) was also discussed. The US cannot accept the 25% flammable contents as a basis of flammability. Currently FEA and UN provision use 100C but the internationally harmonized criteria use 93 C as the hardmonized value.**